

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

TEWANA MITCHELL,

Plaintiff,

v.

RELIABLE SECURITY, LLC,

Defendant.

Civil Action No.

1:15-CV-03814-CAP-AJB

DEFENDANT’S STATUS REPORT ON DISCOVERY

Pursuant to this Court’s February 6, 2016 Minute Order, Defendant Reliable Security, LLC (“Defendant” or “Reliable”) hereby submits this Status Report regarding the volume and cost of native production of electronically stored information (“ESI”) in the above-captioned matter:

1. Per this Court’s February 6, 2016 Minute Order, Defendant was asked to submit a report estimating the size of production and cost differential between native and PDF production of ESI to Plaintiff during the discovery phase of this matter.

2. Defendant reports that the volume of potentially relevant ESI is 3GB. Defendant's counsel arrived at this number by searching relevant email accounts and payroll related Excel spreadsheets, which are the only forms of relevant and responsive ESI in this matter.

3. With respect to PDF production of 3GB of ESI, there is no additional cost associated with production beyond the paralegal time that would otherwise be involved in preparing other responsive documents for production to Plaintiff.

4. The additional cost associated with processing and producing 3GB of ESI in native format is approximately \$3,000. This amount is comprised of a flat rate of \$2,000 for ESI processing and production, plus approximately \$1,000 for hourly paralegal time (\$150/hour) to manage the production of native emails and Excel spreadsheets.

5. Defendant maintains that the additional cost for native production of ESI is unreasonable in this matter given that the damages (*absent attorney's fees*) are likely less than \$10,000.

Respectfully submitted this 26th day of April, 2016.

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/s/ Frederica Joy White

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*Attorney for Defendant
Reliable Security, LLC*

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D), the undersigned counsel of Defendant certify that this document has been prepared in Times New Roman, 14-point font, which is one of the fonts and point selections approved by the Court in Local Rule 5.1(B).

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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2016, the undersigned counsel filed *Defendant's Status Report on Discovery* with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification to the following attorneys of record:

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